



U.S. Department of Justice

Scott C. Blader
United States Attorney
Western District of Wisconsin

Telephone 608/264-5158
TTY 608/264-5006
Administrative Facsimile 608/264-5183
Civil Division Facsimile 608/264-5724
Criminal Division Facsimile 608/264-5054

Address:
222 West Washington Avenue
Suite 700
Madison, Wisconsin 53703

August 15, 2019

VIA HAND DELIVERY

Mr. Peter R. Moyers
Federal Defender Services of Wisconsin, Inc.
22 E. Mifflin St. #1000
Madison, WI 53703

Re: *United States of America v. Ursula Wing*
Case No: 19-CR-84-jdp

Dear Attorney Moyers:

Enclosed please find a USB drive, No. 2370, containing the discovery in this case. As noted on the device, this USB drive is property of the U.S. Attorney's Office. At your earliest convenience, please transfer the discovery to your computer or other storage media and return the USB drive to the U.S. Attorney's Office, attention Kelley Foster. The password for the enclosed USB drive will be emailed to you. This discovery includes Bates numbers 1-34878, and is more specifically described in the included discovery log.

The enclosed materials and any future discovery provided to you which may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law is provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to future discovery requests beyond the scope of its obligations.

Request for Reciprocal Discovery

With this letter, the government requests all reciprocal discovery to which it is entitled under Federal Rules of Criminal Procedure 16(b) and (c) and 26.2, including, but not limited to:

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1. Inspection and/or copies of all books, papers, documents, photographs, tangible objects, or portions thereof in the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in his or her case-in-chief at trial.

2. Inspection and/or copies of the results of any reports of physical or mental examinations and of scientific tests or experiments made in connection with the above-entitled case within the possession or control of the defendant which the defendant intends to introduce as evidence in his or her case-in-chief at trial or which have been prepared by a witness whom the defendant intends to call at trial.

3. Inspection and/or copies of all statements made by all witnesses whom the defendant intends to call at trial.

Notice of Audio/Visual Evidence

This letter will serve as notice that, should the case proceed to trial, the United States intends to introduce in its case-in-chief, the audio and video evidence disclosed herein and in subsequent discovery productions. Moreover, the United States reserves its right to use any audio/video evidence provided to you in discovery for rebuttal or cross-examination.

Request for Notice of Defenses

The Government also requests notice of any intention of your client to rely on an entrapment defense or a defense involving mental condition or duress, and/or an alibi defense for charged offenses.

If you have any questions regarding this matter, please do not hesitate to contact me at (608) 264-5158.

Very truly yours,

SCOTT C. BLADER
United States Attorney

By:

/s/
DANIEL J. GRABER
Assistant United States Attorney